

Message

From: Goodis, Michael [Goodis.Michael@epa.gov]
Sent: 5/26/2021 10:34:50 AM
To: Messina, Edward [Messina.Edward@epa.gov]; Leifer, Kerry [Leifer.Kerry@epa.gov]
CC: Dawson, Jeffrey [Dawson.Jeff@epa.gov]
Subject: RE: follow up from a CLA/RISE call
Attachments: Final Registration Decision Document 01-13-2021_.pdf

Yes – Broflanilide was registered in Jan 2021.

Michael L. Goodis, P.E.
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571-309-5497 (cell)

From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Tuesday, May 25, 2021 6:42 PM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>
Cc: Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: Re: follow up from a CLA/RISE call

Ok. I will stay tuned. Broflani was recently registered correct?

Ed Messina, Esq.
Acting Office Director
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p: (703) 347-0209

On May 25, 2021, at 3:22 PM, Leifer, Kerry <Leifer.Kerry@epa.gov> wrote:

Aaah, the ai's.

I believe all flubendiamide products have been canceled, I am not sure about existing stocks provisions and whether there is any actual use.

In taking a very close second look at accurate chemical structural representations of flubendiamide, pyrifluquinazon and broflanilide, it appears that they actually **don't** meet the letter of the OPPT definition as the perfluoroalkyl group common to all three chemicals is not exactly as given in the OPPT definition. (However they do certainly meet the draft OECD PFAS definition.)

Kerry Leifer, Chief
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e-mail: leifer.kerry@epa.gov

From: Messina, Edward
Sent: Tuesday, May 25, 2021 2:57 PM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: follow up from a CLA/RISE call

The Ais.

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From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Tuesday, May 25, 2021 2:51 PM
To: Messina, Edward <Messina.Edward@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: follow up from a CLA/RISE call

Ed,

If you are asking about the inerts with unknown/variable composition, they are fluorinated polymers—I am also trying to confirm whether they are actually in any registered pesticides as that would obviate the definitional issue, at least for those substances.

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From: Messina, Edward
Sent: Tuesday, May 25, 2021 2:20 PM
To: Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Cc: Leifer, Kerry <Leifer.Kerry@epa.gov>
Subject: RE: follow up from a CLA/RISE call

Are they long chains? Acids? What's next?

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From: Dawson, Jeffrey <Dawson.Jeff@epa.gov>
Sent: Tuesday, May 25, 2021 1:54 PM
To: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Cc: Leifer, Kerry <Leifer.Kerry@epa.gov>
Subject: FW: follow up from a CLA/RISE call

Mike/Ed,

This is a follow up to the CLA/RISE call earlier today. See the information below from Kerry Leifer. Based on that info, it looks like there are 3 ais noted below which are consistent with the OPPT definition. Essentially there are no inerts but as Kerry notes below he is still checking on a few with unknown/variable composition.

Thanks Kerry!

Hope this helps clarify the discussion.

Jeff

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From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Tuesday, May 25, 2021 1:49 PM
To: Dawson, Jeffrey <Dawson.Jeff@epa.gov>
Subject: RE: follow up from a CLA/RISE call

Hi Jeff,

Yes, in looking at Tony's reports and the OPPT working PFAS definition, there were three active ingredients that have a structure consistent with the OPPT working PFAS definition: Flubendiamide, Pyriproxyfen, and Broflanilide.

There are no inert ingredient with defined structures that meet the OPPT definition. I am still checking on a few inerts that are considered chemical substances of unknown or variable composition (UVCB substances) cannot be represented by unique structures and molecular formulas but that may meet the OPPT criteria.

Kerry

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From: Dawson, Jeffrey
Sent: Tuesday, May 25, 2021 1:30 PM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>
Subject: follow up from a CLA/RISE call

Kerry,

Today in a call with CLA/RISE the issue came up of the PFAS definition. In the files you sent me earlier Tony Williams had pulled from the Comptox dashboard lists of pesticides that could meet varying definitions CF2 including CF3, CF3 substructure for inerts and actives.

Have you ever reconciled the information he gave you with the definition that we are relying on from OPPT available at:

<https://www.epa.gov/pesticides/pfas-packaging>

OPPT applies the following "working definition" when identifying PFAS on the TSCA Inventory: a structure that contains the unit R-CF₂-CF(R')(R''), where R, R', and R'' do not equal "H" and the carbon-carbon bond is saturated (note: branching, heteroatoms, and cyclic structures are included).

Thanks

Jeff

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